

EXHIBIT 19

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF SAN FRANCISCO

COMMUNITIES FOR A BETTER)	CASE NO.
ENVIRONMENT, A CALIFORNIA)	997013
NON-PROFIT CORPORATION, ON)	
BEHALF OF THE GENERAL PUBLIC,)	
)	
PLAINTIFF,)	
)	
VS.)	
)	
UNOCAL CORPORATION, ET AL.,)	
)	
DEFENDANTS.)	

DEPOSITION OF MEENA NAINAN

FRIDAY, AUGUST 11, 2000

FILE NO. 000811TRB
REPORTED BY TERRY R. BANKEY, C.S.R. NO. 7442


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11:50 AM Do you know whether Mobil ever shared the
2 results of its Sensitive Receptor Survey to any
3 regulatory agencies?

4 A You mean the document itself?

11:50 AM Q The document itself or the results or
6 anything like that.

7 A On a site-by-site basis that information
8 would be given to a regulator as they're discussing
9 the site with us. But the document itself, I don't
11:50 AM believe that's been given to a regulator.

11 Q Do you know whether any information other
12 than on a site specific basis, bases, any information
13 regarding, for example, X number of wells located
14 within a quarter mile of a station was given to
11:50 AM regulatory agencies or the federal government?

16 MS. WEAVER: Objection. Asked and answered.

17 THE WITNESS: Yeah, I -- I don't know, but I
18 don't believe so.

19 BY MS. EVANGELISTI:

11:51 AM Q Other than reporting to the regulatory
21 agencies their results of MTBE testing as required
22 under the rules, do you know whether Mobil ever
23 presented to the regulatory agencies the printouts of
24 its -- of its surveys, for lack of a better word?

11:51 AM A Which surveys?

11:51 AM Q The ones -- I'm sorry.

2 Specifically testing for MTBE at its sites
3 in California.

4 A Are we referring back then to -- I just want
11:51 AM to make sure I'm clear. Like Exhibit 3?

6 Q 3 and Exhibit 5 and/or Exhibit 2.

7 A To the best of my knowledge, with the
8 exception of site by site, you know, giving that
9 information to the regulators, I don't believe we've
11:52 AM given these -- this type of analysis to them or this
11 exhibit.

12 And when I say "this exhibit," referring to
13 Exhibits 3, 2 or 5.

14 Q 4, isn't that? No, 5?

15 A Exhibit 5.

16 Q That one that I can't get straight. Sorry.

17 Okay. Let's look at Exhibit 7 which should
18 say "Service Station Tank Testing Program" at the
19 top.

11:52 AM A Yes.

21 (The document referred to was
22 marked as Plaintiff's Exhibit 7 for
23 identification.)

24 BY MS. EVANGELISTI:

11:52 AM Q Do you recognize this document?